

## **RECYCLABILITY & RECYCLED CONTENT USE OF CLAIMS GUIDANCE**

DRAFT FOR CONSULTATION

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## 1 Introduction

Environmental claims have taken the world by storm, as companies transition from linear towards a circular economy and as the consumers look for products with lower impact on the environment. The overall presence of green claims in non-food packaging exceeds 75%, with at least 32% of those claims referring to recyclability using the Green Dot or Mobius Loop logo<sup>1</sup>. Moreover, 59% of consumers perceive these green claims as unclear.

Upcoming regulatory requirements at EU level call for a transparent, structured and consistent approach to recyclability and recycled content claims on the EU market. These include the revision of the essential requirements for recyclable packaging, where all packaging must be recyclable by 2025, within the Packaging and Packaging Waste Directive<sup>2</sup>; as well as mandatory requirements for recycled content in beverage bottles the Single-Use Directive<sup>3</sup>.

RecyClass, a comprehensive cross-industry initiative that works to advance plastic packaging recyclability and to establish a harmonized approach towards recycled content calculation in Europe, via its scientifically-based approach to recyclability and recycled has laid foundation for a common methodology and compunderapproach.

This Guidance lays out the guiding principles on how to use the claims granted via the different RecyClass Certifications or Technology/Product Approvals both for recyclability and recycled content of plastics. Assessments are conducted by a third-party Certification Body who guarantee independent evaluation of the recyclability of a package and/or verification of traceability of recycled material within a production site.

The RecyClass Certification may be voluntarily communicated to final consumers, stakeholders or costumers, via different channels. Both on-product and off-product claims are allowed taking into consideration the conditions listed in the section below.

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<sup>1</sup> EC, 2014. Consumer Market Study on Environmental Claims for Non-Food Products available on: [https://ec.europa.eu/info/sites/info/files/study\\_on\\_environmental\\_claims\\_for\\_non\\_food\\_products\\_2014\\_en.pdf](https://ec.europa.eu/info/sites/info/files/study_on_environmental_claims_for_non_food_products_2014_en.pdf)

<sup>2</sup> OJ L 150, 14.6.2018, p. 141–154

<sup>3</sup> Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment (OJ L 155, 12.6.2019, p. 1–19)

24 This guidance was developed in line with the ISEAL Sustainability Claims Good Practice Guide<sup>4</sup> which  
25 lays out guidance for scheme owners in the development of systems for communicating on claims and  
26 labels related to their standard system.

## 27 **2 Guiding principles for the use of RecyClass claims**

28 Before focusing on specific claims, users must consider the following guiding principles aimed at  
29 procuring commercial practices which must be clear, honest and straightforward. According to  
30 Regulation 2005/29/EC, an indication of misleading claims would be:

- 31 • Claims containing untruthful or false information in some way which would deceive the average  
32 consumer, even if the information is factually correct.
- 33 • Claims leading the average consumer to make a decision that he would not have taken otherwise.
- 34 • Claims which omit material information that the average consumer needs according to the  
35 context.

36 Following these guiding principles, claims should avoid general statements such as “environmentally  
37 friendly” or “green product” which are general claims that may be confusing for the consumers as they  
38 do not communicate clearly why those products are better for the environment. For recycled content,  
39 claims must state the percentage of recycled content and avoid vague messages such as “contains  
40 recycled plastics” or “circular plastics”. Messages should be clear to the consumer by using statements  
41 such as “contains X% of recycled plastics in the bottle”. More guidance on specific messages is  
42 described in Annex V and VI.

## 43 **3 RecyClass Recyclability Claims**

44 The following section lays down rules and guidance on how to communicate the results obtained via  
45 the Recyclability Certification: Technology/Product approvals, Design-for-Recycling and Recyclability  
46 Rate Certification.

47 The Design-for-Recycling Certification and Recyclability Rate Certification are assessments designed to  
48 verify the recyclability of a package based on the RecyClass Methodology<sup>5</sup> and Design for Recycling

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<sup>4</sup> ISEAL. Sustainability Claims Good Practice Guide available at [https://www.isealalliance.org/sites/default/files/resource/2017-11/ISEAL\\_Claims\\_Good\\_Practice\\_Guide.pdf](https://www.isealalliance.org/sites/default/files/resource/2017-11/ISEAL_Claims_Good_Practice_Guide.pdf)

<sup>5</sup> RecyClass Recyclability Methodology available at <https://recyclass.eu/wp-content/uploads/2020/06/RECYCLASS-RECYCLABILITY-METHODOLOGY-2020-06-04.pdf>

49 Guidelines<sup>6</sup>. When a package presents an innovation which is not considered in the guidelines,  
50 additional laboratory testing is required. Additional testing follows the RecyClass Recyclability Protocol  
51 Evaluations<sup>7</sup>. Results are assessed by the RecyClass Technical Committee that issues an Approval Letter  
52 in case of a positive outcome.

53 More information on the requirements and procedures of the Recyclability Certifications can be found  
54 in the documents “Certification Procedures and Quality Management<sup>8</sup>” and “RecyClass Recyclability  
55 Methodology”.

56 On the other hand, communication and claims available for the different Certifications or Approval  
57 Letters are described below.

### 58 **3.1 RecyClass Claims based on a Technology/Product Approval**

59 A Technology/Product Approval offers a recyclability assessment of a specific technology or feature of  
60 a package (e.g. a multilayer film; a combination of label and glue). The Technology/Product Approval  
61 is granted by the RecyClass Platform Technical Committees (TC) based on the results of an independent  
62 laboratory testing in accordance with RecyClass Recyclability Protocol Evaluations.

63 The decision of the TC will determine if the technology has:

- 64 - Full compatibility with a certain recycling stream
- 65 - Limited compatibility with a certain recycling stream
- 66 - No compatibility with recycling.

67 RecyClass issues a Technology/Product Approval Letter to the applicant which will detail the result of  
68 the assessment and the conditions of the Approval. Example of a letter can be found in Annex I.

69 Upon the approval of the applicant, RecyClass publishes a press release announcing the novel findings.  
70 The text must refer to the information reported in the Approval Letter and must avoid any marketing  
71 statements about the product.

72 The applicant may also communicate the findings as specified in the Approval Letter, more information  
73 can be found in the sections below.

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<sup>6</sup> Design for Recycling Guidelines available at <https://recyclclass.eu/recyclclass/design-for-recycling-guidelines/>

<sup>7</sup> Recyclability Protocol Evaluations available at <https://recyclclass.eu/recyclability-evaluation-protocols/>

<sup>8</sup> Certification Procedures and Quality Management available at <https://recyclclass.eu/wp-content/uploads/2020/07/RecyClass-Recyclability-Certification-Procedures-and-Quality-Management-2020-30-07-2020-002.pdf>

### 74 **3.1.1 Claims business-to-business**

75 The applicant may communicate to costumers, stakeholders and suppliers the results of the Approval  
76 Letter. Used wording must correspond to the Technology/Product Approval Letter and it must mention  
77 RecyClass. The applicant may also link the communication to the Approval Letter published at  
78 [www.recyclclass.eu](http://www.recyclclass.eu).

### 79 **3.1.2 Claims business-to-consumer**

80 A Technology/Product Approval grants a full or limited compatibility with a certain recycling stream.  
81 However, it does not constitute a Certification of a final product. The applicant can communicate to  
82 consumers the results of the Approval Letters via a press release, social media and direct  
83 communications. However, this communication must refer to the technology or package as it was  
84 assessed and described in the Approval Letter. The wording used must correspond to the same wording  
85 as used in the Approval Letter and it must mention RecyClass.

86 Under this category, the applicant cannot showcase a logo or a claim of recyclability in the final  
87 package.

## 88 **3.2 RecyClass Claims based on a Designed-for-Recycling Certification**

89 The Design-for-Recycling Certification is a qualitative evaluation of the recyclability of a package based  
90 on the RecyClass Tool<sup>9</sup>. This Certification assesses a package and its design based on its compatibility  
91 with the European state-of-the-art recycling , by verifying to which extent it is recyclable. Additionally,  
92 testing on sorting may also be part of the assessment.

93 The assessment is conducted by an independent Certification Body<sup>10</sup> which issues an Audit Report and  
94 a Certificate stating the class result received by the package. The certificate displays a class result  
95 grading the package from a class A to F which relate to, respectively, full to no recyclability. This grading  
96 system provides for a simplified communication while conveying the message that recyclability is non-  
97 binary. An example of this Certificate may be found in Annex II.





98 Certification holder may claim that their package is designed-for-recycling and may use the Certificate  
99 and logo found in Figure 1 in their communications following the guidance laid out in the next sections.

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<sup>9</sup> RecyClass Tool available at <https://recyclclass.eu/tool/>

<sup>10</sup> The list of recognised Certification Bodies is available at <https://recyclclass.eu/recyclclass/recyclability-product-certification/>

100 **Figure 1. Design-for-recycling logo option proposals**

Logo proposals	Messages proposals to be included in the logos
 <p>Example 1</p>	<p>Packaging Recyclability</p> <p>or</p>
 <p>Example 2</p>	<p>Designed-for-recycling</p> <p>and</p> <p>Recycle me!</p>
 <p>Example 3</p>	
 <p>Example 4</p>	

101 The design-for-recycling Certification features a recyclability class according to the results of the  
 102 audit. The logo indicates the grade issued to the certified packaging.

103 Certification holders who obtained a grading between A – C can claim recyclability for the certified  
104 packages and equivalent. Certification results class D – F may claim their corresponding class and  
105 equivalent logo. However, no additional messages regarding the recyclability of the package can be  
106 used. Although the package must be collected, its design presents fundamental design flaws that will  
107 affect the quality of the output material. Therefore, to avoid greenwashing, a recyclability claims are  
108 NOT allowed in these cases.

109 Additional information regarding how to dispose of a package is out of scope of the Certification and it  
110 is specific for each Member State where green dot systems procure guidelines to consumers.

### 111 **3.2.1 Business-to-business Claims**

112 Certification holder may use the Certificate or the corresponding logo in communication such as  
113 website, press releases, social media channels and direct communication aimed at stakeholders,  
114 costumers or suppliers. Certification holder can also use the logo in their documentation delivery notes  
115 or product specification sheets corresponding to the certified packaging. These claims must be paired  
116 with a link to the Design-for-Recycling Certificate (e.g. certificate code) and a reference to RecyClass.

117 Off-product claims must specify that the Design-for-Recycling Certification class result offers scoring on  
118 recyclability at a EU level which does not consider the specific collection system realities in the different  
119 EU countries. A disclaimer which indicates that the recyclability of the package was assessed at a EU  
120 level and that collection systems might vary locally must be clearly stated. Additionally, it is  
121 recommended to include a list of countries where this packaging is collected (or exlude certain  
122 countries where this is not the case).

123 When the package is not final, Certification holder must avoid using the logo with the class on-  
124 product. On-product use of the logo always refers to the final packaging.

### 125 **3.2.2 Business-to-consumer Claims**

126 Certification holder may use a claim or the corresponding logo with the issued Certificate in  
127 communications such as website, press releases, social media channels and direct communication  
128 (banners, ads, etc.) aimed at consumers. Claims and logo may also be used on-product.



129 Certified packages must achieve an assessment result between A and C in order to communicate that  
130 the packaging is designed to be recycled. A list of examples of adequate messages may be found in  
131 Annex V.

132 Design-for-Recycling Certification is not linked to a specific country and collection systems realities  
133 were not considered during the assessment. Therefore, claims must include a clarification stating that  
134 the recyclability of the packaging is subject to the collection system established in a specific location.

135 Messages informing the consumer about the proper disposal of the package based on the different  
136 national schemes are strongly recommended.

137 The document “RecyClass Logo Design Guidance” offers guidance to marketeers on how to properly  
138 display the logo in terms of graphic design, allowing flexibility to choose an option which is better suited  
139 to the packaging branding. RecyClass proposes several versions of the logo in different sizes to fit all  
140 types of packaging. Larger packaging must display the logo with a reference to the Certificate code. This  
141 facilitates the tracing of claims and facilitates the reporting of misuse. For smaller packaging, a simpler  
142 version of the logo can be used.

### 143 **3.3 RecyClass Claims based on a Recyclability Rate Certification**

144 The Recyclability Rate Certification is a quantitative evaluation of the recyclability of a package  
145 according to the RecyClass Recyclability Methodology verified by a recognised Certification Body<sup>11</sup>.  
146 Recyclability is measured in form of a percentage of the total body weight of the final package that will  
147 be effectively recycled.

148 The Certification Body will issue an Audit Report and Certificate following the assessment. The specific  
149 percentage results in a more technical approach to the package’s recyclability while the Certification is  
150 still aimed mainly at the final consumer. The Certificate is linked to a country or group of countries  
151 depending on their collection systems. An example of the Certificate may be found in Annex III.

152 In addition to the share of material recyclability, the Certificate includes an equivalent class result to  
153 the rate (e.g. 100% recyclability is equivalent to class A). More information on the equivalences between  
154 rate and class result is available in the document “RecyClass Recyclability Methodology”. The double





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<sup>11</sup> List of recognised Certification Bodies available at <https://recyclass.eu/recyclass/recyclability-product-certification/>

155 scoring ensures complete alignment in the communication of the results for both Recyclability  
 156 Certifications.

157 Certification holder may claim recyclability for their packaging and may use the logo found in Figure 2  
 158 for communication purposes in line with the guidance laid out in the following sections.

159 **Figure 2. Recyclability logo option proposals**

Logo proposals	Messages proposals to be included in the logos
 <p>Example 1</p>	<p>Packaging Recyclability</p> <p>or</p> <p>Designed-for-recycling</p> <p>and</p> <p>Recycle me!</p>
 <p>Example 2</p>	
 <p>Example 3</p>	
 <p>Example 4</p>	

160 The Recycling Rate Certification features a recyclability percentage and equivalent class according to  
 161 the results of the audit. The logo indicates the grade issued to the certified packaging.

162 Certification holders who obtained a recyclability rate higher than 50%, or classes between A and C, can  
163 claim recyclability of the certified packages and equivalent. Certification results between classes D and  
164 F may claim their corresponding class and equivalent logo. However, no additional messages regarding  
165 the recyclability of the package can be used. Although the package must be collected, its design  
166 presents fundamental flaws which will affect the quality of the output material. Therefore, to avoid  
167 greenwashing, a recyclability claims are NOT allowed in these cases. Examples of claims may be found  
168 in Annex V may also be used to communicate the packaging recyclability.

169 Additional information regarding how to dispose of a package is out of scope of the Certification as it is  
170 specific to each Member State where green dot systems procure guidelines to consumers.

171 Information on how to communicate about the Certification results, depending on the audience, is  
172 provided in sections below.

### 173 **3.3.1 Business-to-business Claims**

174 Certification holder may use the Certificate or the corresponding logo in communication such as  
175 website, press release, social media channels and direct communication aimed at stakeholders, EPR  
176 schemes, costumers or suppliers. Certification holder can also use the logo in their documentation  
177 delivery notes or product specification sheets corresponding to the certified packaging. These claims  
178 must be paired with a link to the Recyclability Rate Certificate (e.g. certificate code) and a reference to  
179 RecyClass.

180 Business-to-business communication must refer to the recyclability rate percentage which is easily  
181 understood within the industry and show an accurate result of the assessment. Claims must be in line  
182 with the information stated in the Certificate. Information about the specific geographical area linked  
183 to the Certificate must be considered.

### 184 **3.3.2 Business-to-consumers claims**

185 Certification holder may use the Certificate or the corresponding logo in communication such as  
186 website, press releases, social media channels and direct communication (ads, banners, etc.) aimed at  
187 consumers. Claims and logo may also be used on-product which allows the consumer to make an  
188 informed purchase based on packaging's recyclability class.

189 Claims and logo must refer to the class result only, which provides a simple indication of the package  
190 recyclability to avoid creating confusion with a recycled content percentage in the product. Consumers  
191 will benefit from clear and simple communication messages. Claims can refer to a packaging  
192 recyclability when the recyclability rate is higher than 50% (or class A, B or C). A list of examples of  
193 adequate messages may be found in Annex V.

194 The Recyclability Rate Certification is linked to a specific geographical area. The use of claims and logo  
195 should be limited to the countries mentioned in the Certificate.

196 The document “RecyClass Logo Design Guidance<sup>12</sup>” offers additional information on how to properly  
197 display the logo in terms of graphic design, allowing flexibility to marketers to choose an option which  
198 is better suited to their branding. RecyClass proposes several versions of the logo in different sizes to fit  
199 all types of packaging. Larger packaging must display the logo with a reference to the Certificate code.  
200 This facilitates the tracing of claims and facilitates the reporting of misuse. For smaller packaging, a  
201 simpler version of the logo can be used.

#### 202 **4 RecyClass Recycled Content Claims: Claims based on a Recycled Content** 203 **Traceability Certification**

204 RecyClass Recycled Content Traceability Certification allows certification holders to claim the recycled  
205 content of a product, component or compound to suppliers, costumers, stakeholders or consumers  
206 when it is certified via a Recycled Content Traceability Certification. The Certification verifies that  
207 traceability of recycled content in plastics is in place within the whole value chain process. The  
208 Certification Scheme was developed according to ISO 22095<sup>13</sup> and EN 15343<sup>14</sup> on traceability,  
209 conformity assessment and recycled content.

210 The Certification is granted via independent Certification Bodies. Following an on-site audit, an Audit  
211 Report, Summary Sheet and Certificate will be issued, detailing the successful certification of the  
212 applicant and providing a list of certified products which contain recycled content. An example of the

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<sup>12</sup> RecyClass Logo Design Guidance will be developed once the final logos are in place.



<sup>13</sup> ISO 22095 Chain of Custody – General Terminology and models available at <https://www.iso.org/standard/72532.html>

<sup>14</sup> EN 15343:2007 Plastics. Recycled plastics. Plastics recycling traceability and assessment of conformity and recycled Content available at <https://www.evs.ee/en/evs-en-15343-2007>

213 Certificate may be found in Annex IV. The Certificate includes a list of products or components with  
 214 recycled content, specifying if it refers to pre- or post-consumer material.

215 Claims of recycled content can often be paired with their corresponding logo for pre-consumer, post-  
 216 consumer and mixed origins included in Figure 3.

217 **Figure 3. RecyClass Recycled Content Traceability logo proposals**

Logo Proposals	Message Proposals
 <p style="text-align: right;"><i>Example 1</i></p>	<p>X% recycled plastics “pre-consumer origin”</p> <p>X% recycled plastics “post-consumer origin”</p> <p>X% recycled plastics “mixed origin”</p>
 <p style="text-align: right;"><i>Example 2</i></p>	

218 Claims and logo for certified products, compounds or components can only be used with a recycled  
 219 content percentage equal or higher than 10%.

220 Claims and logo percentage must reflect the recycled content as per the Certification when  
 221 communicating with the industry. When communicating to the consumer, please see section 4.2.

222 Requirements on the use of the claims and labels are further detailed in the sections below.

223 **4.1 Business-to-business Claims**

224 Certification holders may use the Certificate itself or the recycled content percentage for certified  
 225 products or components along the value chain in communication such as website, press releases,  
 226 social media channels and direct communication with stakeholders, costumers and suppliers.

227 Certification holder can also use the claim or logo in their documentation, delivery notes, product boxes  
 228 or product specification sheets corresponding to certified products. The logo must use the percentage  
 229 as stated in the Summary Sheet and it should clarify the origin of the material accurately. These claims  
 230 must be paired with a link to the Recycled Content Traceability Certification (e.g. certificate code) and  
 231 a reference to RecyClass.

232 Additionally, RecyClass highly recommends sharing the Summary Sheet where relevant information  
233 regarding the certified site and products may be found. In those claims that the Certificate is not shared,  
234 a reference to the Certificate and RecyClass must be procured.

235 Claims of recycled content traceability according to the Certification within the value chain can be:

- 236 - **Generic claims recognising a site Certification** where a third-party auditor verified the ability of  
237 the site to trace the recycled content used in an array of a product portfolio.  
238
- 239 - **Specific claims concerning the recycled content of a product or component** which was  
240 included in the list of certified products in the Audit Report and Certification Summary Sheet.  
241 Claims of recycled content in products and components throughout the value chain must be  
242 precise to the result of the Audit specifying origin of the waste and percentage of recycled  
243 content (e.g. transparent film with 50% recycled content sold to a filling company).

#### 244 **4.2 Business-to-consumer Claims**

245 Certification holders may use claims of recycled content towards consumers via website, press releases,  
246 social media communication or direct communication (banners, ads, etc.); as well as logo display on  
247 and off the product. Claims to consumers must refer to RecyClass Certification of Recycled Content  
248 Traceability.

249 Off-product claims must be linked to a specific product or component certified when communicating  
250 towards the consumer. The information needs to be aligned with the data provided during the audit  
251 process which is reported in the Certificate. When claims refer to a component, this must be specifically  
252 clarified. All claims of recycled content must be linked to a Certification code which can be identified  
253 and linked to an Audit Report. In addition to the percentage, the applicant can choose to add additional  
254 messages regarding the recycled content of a specific product or the Certification obtained in a specific  
255 site. A list of examples of accepted claims can be found in Annex V.

256 Certification also covers recycled content within components of a final package. Claims and logo can  
257 be used on and off product, when the component represents at least 50% of the total weight of the  
258 product. In this case it must be clarified that the claim refers to a specific component and not the overall  
259 product.

260 When calculating the recycled content of a final product with several plastic components, results must  
261 be rounded to an integer value (e.g. 81.665% → 82%, 81.499% → 81%).

262 - Additionally, the recycled content percentage result can be rounded up by 1% in order to  
263 achieve a unit value finished in 0 or 5 (e.g. 59.2% → 60%, 64.1% → 65%, etc.).

264 - Alternatively, the percentage result can always be rounded down (e.g. 73% → 70%, 92.4% →  
265 90%).

266 - Finally, the applicant can choose to use the exact value (e.g. 82% or 81%).

267 As an example, for packaging, the calculation of recycled plastic for the whole product considers the  
268 overall weight of the plastic components whereas non-plastics are excluded (e.g. paper, metal, labels,  
269 etc.).

270 - Example: HDPE liquid yoghurt bottle 1L weighing 30g (25 g main body, 2g sleeve, 3g cap). The  
271 main body of the bottle has 98% recycled content, the other 2% are additives. The recycled  
272 content of the product taking into account the total weight will be 91,666%. The value can be  
273 rounded down to 92% or 90%. This is the value that must be communicated to the final  
274 consumer and included in the recycled content logo. Additional guidance on the value to be  
275 displayed on the logo is in section 4.2.

276

277 Alternatively, certification holder can communicate the recycled content per component.

278 - Following the previous example, the certification holder could also communicate the 98%  
279 recycled content excluding excluding cap and label. In this case, the 98% can be rounded up to  
280 100% as the total share of recycled content is higher than 95% specifying that it only  
281 corresponds to the bottle.

282 Claims of 100% of recycled content are possible when the percentage of the certified product or  
283 component is higher than 95% (*statement under revision*).

284 In addition to the percentage of recycled content<sup>15</sup>, claims and logo includes the indication of the origin  
285 of the waste: pre-consumer or post-consumer.

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<sup>15</sup> Definitions as applied in the Recycled Content Traceability Certification available in section 6: Glossary of this document.

286 The document “RecyClass Logo Design Guidance” offers additional information on how to properly  
287 display the logo in terms of graphic design, allowing flexibility to marketers to choose an option which  
288 is better suited to their branding. RecyClass proposes several versions of the logo in different sizes to fit  
289 all types of packaging. Larger packaging must display the logo with a reference to the Certificate code.  
290 This facilitates the tracing of claims and facilitates the reporting of misuse. For smaller packaging, a  
291 simpler version of the logo can be used.

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## 292 5 Glossary

293 **Certification holder:** Applicant of a RecyClass Certification that successfully passed the audit for  
294 recycled content or that obtained an assessment for recyclability.

295 **Consumers:** General public.

296 **Pre-consumer<sup>16</sup>:** Material diverted from the waste stream during a manufacturing process. Excluded is  
297 reutilization of materials such as rework, regrind or scrap generated in a process and capable of being  
298 reclaimed within the same process that generated it.

299  
300 **Post-consumer<sup>17</sup>:** Material generated by households or by commercial, industrial and institutional  
301 facilities in their role as end-users of the product which can no longer be used for its intended  
302 purpose. This includes returns of material from the distribution chain.

303

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<sup>16</sup> Definitions extracted from EN 14021:2016 Environmental labels and declarations — Self-declared environmental claims (Type II Environmental labelling) available at <https://www.evs.ee/en/evs-en-14021-2004>

<sup>17</sup> Definitions extracted from EN 14021:2016 Environmental labels and declarations — Self-declared environmental claims (Type II Environmental labelling) available at <https://www.evs.ee/en/evs-en-14021-2004>

304 **Annex I: Approval Letter Example**



c/o Plastics Recyclers Europe  
Avenue de Droqueville 12  
1150 Brussels, Brussels

Phone: +32 2 815 24 60  
[info@recyclclass.eu](mailto:info@recyclclass.eu)  
[www.recyclclass.eu](http://www.recyclclass.eu)

**NAME OF THE COMPANY**

**RECYCLASS TECHNOLOGY APPROVAL**

*Brussels, DD/MM/YYYY*

The RecyClass **XXX** Technical Committee was requested to carry out an assessment of **NAME OF THE TECHNOLOGY** by **NAME OF THE COMPANY** to verify its impact on the quality of **RECYCLING STREAM**.

**DESCRIPTION OF THE PRODUCT, RESULTS OF THE TEST, REFERENCE TO THE PROTOCOL USED.**

Based on these results, RecyClass certifies that **NAME OF THE TECHNOLOGY** technology will not have a negative impact on the current European **RECYCLING STREAM**...

**LIST OF CONDITIONS LINKED TO THE APPROVAL**

Any change on the formulation of the technology must be communicated to the Technical Committee which will reassess the approval of the technology.

**Annex I**

**PICTURE OF THE TECHNOLOGY TESTED**

**About**

**RecyClass** is a comprehensive cross-industry initiative that works to advance plastic packaging recyclability within Europe. RecyClass assesses recyclability and provides specific recommendations on how to improve packaging design to fit current recycling technologies. Activities within RecyClass include the development of Recyclability Evaluation Protocols and testing of innovative materials. Findings are used to update the RecyClass Design for Recycling guidelines and the online free tool.

Contact: [Nirela.Boada@plasticrecyclers.eu](mailto:Nirela.Boada@plasticrecyclers.eu) [www.recyclclass.eu](http://www.recyclclass.eu)

305

306

307 **Annex II: Design-for-Recycling Certificate Example**



308 \*Validity conditions may be found in the Audit Report xxx-xxx-xx

309 Annex III: Recyclability Rate Certificate Example



310

\*Validity conditions may be found in the Audit Report xxx-xxx-xx

311 **Annex IV: Recycled Content Traceability Certificate**

The form is enclosed in a decorative green border with a repeating pattern. At the top left is the RecyClass logo. The title **RECYCLED CONTENT TRACEABILITY CERTIFICATE** is centered. Below it, the text reads: "THIS CERTIFIES THAT" followed by a blank line. A paragraph states: "has the required procedures in place into their site in order to ensure the traceability of recycled material incorporated in the products annexed to this Certificate." Another line reads: "This Certificate is valid until" followed by a blank space. At the bottom left, a note says: "This certificate is based on the Audit Report n°" followed by a blank space.

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The form continues with the RecyClass logo and title **RECYCLED CONTENT TRACEABILITY CERTIFICATE**. Below the title is the heading **List of Certified Products**. A table with four columns follows: "Name of the Product/Family", "Reference code", "Recycled Content (pre-consumer)", and "Recycled Content (post-consumer)". The table has 14 empty rows for data entry. At the bottom left, a note says: "This certificate is based on the Audit Report n°" followed by a blank space.

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313 **Annex V: Accepted Recyclability Messages**

314 The following list of messages or close equivalents may be used when communicating the results of the  
315 Recyclability Certifications when the results obtained were:

- 316 - Class A, B or C
- 317 - Recyclability rate of 50 to 100%

	Proposed messages
1	(Plastic package) designed to be recycled
2	Recyclable (package) – check local collection schemes
3	(Plastic package) ready to be recycled
4	(xx component) designed to be recycled
5	The recyclability of this package is certified by RecyClass / independently

318 Additionally, the following messages can be used for Recyclability Rate Certifications linked to a  
319 specific location with results between 50 and 100%:

	Proposed messages – Recyclability Rate
1	Recyclable package
2	e.g. Recyclable bottle (component specific)
3	The recyclability of this package is certified by RecyClass / independently

320

321 **Annex VI: Accepted Recycled Content messages**

322 The following claims provide a list of claims to be used when communicating the recycled content of  
323 a product.

	Proposed messages
1	Contains xx% recycled plastics
2	Site with verified traceability for recycled content products
3	e.g. contains xx% recycled plastics in the bottle / excluding cap and label
4	Contains xx% recycled plastics certified independently by RecyClass

324

DRAFT FOR CONSULTATION

## 325 **Annex IX: References**

- 326 EC, 2014. Consumer Market Study on Environmental Claims for Non-Food Products available on:  
327 [https://ec.europa.eu/info/sites/info/files/study\\_on\\_environmental\\_claims\\_for\\_non\\_food\\_products\\_2014\\_en.pdf](https://ec.europa.eu/info/sites/info/files/study_on_environmental_claims_for_non_food_products_2014_en.pdf)
- 328 Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste (OJ L 312, 22.11.2008, p. 3)
- 329 Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain  
330 plastic products on the environment (OJ L 155, 12.6.2019, p. 1–19)
- 331 ISEAL. Sustainability Claims Good Practice Guide available at [https://www.isealalliance.org/sites/default/files/resource/2017-11/ISEAL\\_Claims\\_Good\\_Practice\\_Guide.pdf](https://www.isealalliance.org/sites/default/files/resource/2017-11/ISEAL_Claims_Good_Practice_Guide.pdf)  
332
- 333 RecyClass Recyclability Methodology available at <https://recyclclass.eu/wp-content/uploads/2020/06/RECYCLASS-RECYCLABILITY-METHODOLOGY-2020-06-04.pdf>  
334
- 335 Design for Recycling Guidelines available at <https://recyclclass.eu/recyclclass/design-for-recycling-guidelines/>
- 336 Recyclability Protocol Evaluations available at <https://recyclclass.eu/recyclability-evaluation-protocols/>
- 337 Certification Procedures and Quality Management available at <https://recyclclass.eu/wp-content/uploads/2020/07/RecyClass-Recyclability-Certification-Procedures-and-Quality-Management-2020-30-07-2020-002.pdf>  
338
- 339 RecyClass Tool available at <https://recyclclass.eu/tool/>
- 340 The list of recognised Certification Bodies is available at <https://recyclclass.eu/recyclclass/recyclability-product-certification/>
- 341 EN 14021:2016 Environmental labels and declarations — Self-declared environmental claims (Type II Environmental labelling)  
342 available at <https://www.evs.ee/en/evs-en-14021-2016>